

23 MAG 6513

UNITED STATES OF AMERICA

v.

EDDIE MANUEL NUNEZ SANTOS,
a/k/a “Lucas,”

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 875(c),
1038(a)(1), 2251(a) and (e),
2252A(a)(2)(B) and (b)(1), 2422(b), 2427,
and 2

COUNTIES OF OFFENSE:
NEW YORK, BRONX,
WESTCHESTER, PUTNAM,
DUTCHESS

SOUTHERN DISTRICT OF NEW YORK, ss.:

JACQUELINE ROSS, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation (“FBI”) and a member of the FBI’s New York Joint Terrorism Task Force (“JTTF”), and charges as follows:

COUNT ONE

(Threatening Interstate Communications)

1. In or about September 2023, in the Southern District of New York and elsewhere, EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to kidnap a person and injure the person of another, to wit, SANTOS sent electronic messages over the Internet to numerous institutions, including schools, synagogues, airports, at least one hospital, and a shopping mall, in Manhattan, New York, the Bronx, New York, and elsewhere, in which he threatened that he had planted bombs at those locations and that the bombs would detonate in the near future and kill people.

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT TWO

(False Information and Hoaxes)

2. In or about September 2023, in the Southern District of New York and elsewhere, EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, knowingly engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably be believed and where such information indicated that an activity had taken, was taking, or would take place that would constitute a violation of Chapters 40, 44, and 113B of Title 18, United States Code, including Title 18, United States Code, Sections 2332a(a) (use of a weapon of mass destruction), 2332f(a) (bombing a place of public use, government facility, public transportation system, or infrastructure facility), and 844(i) (destruction of a building or vehicle by means of explosive), to wit, SANTOS conveyed false bomb threats to numerous schools, synagogues, airports, at least one hospital, and a shopping mall, in Manhattan,

the Bronx, and elsewhere, which triggered emergency law enforcement responses and caused significant disruptions to the targeted institutions and areas, including, among other things, school evacuations and closures, airline flight delays, and a lockdown of a hospital.

(Title 18, United States Code, Sections 1038(a)(1) and 2.)

COUNT THREE
(Attempted Sexual Exploitation of a Child)

3. From at least in or about June 2023, through in or about September 2023, in the Southern District of New York and elsewhere, EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, and attempted to do so, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, SANTOS attempted to induce a 15-year-old minor in Westchester County, New York (“Victim-4,” as defined below) to engage in sexually explicit conduct, photograph the conduct, and transmit the photographs over the Internet to SANTOS in Peru.

(Title 18, United States Code, Sections 2251(a) and (e), and 2.)

COUNT FOUR
(Attempted Coercion and Enticement of a Minor)

4. From at least in or about June 2023, through in or about September 2023, in the Southern District of New York and elsewhere, EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, SANTOS, while in Peru, communicated with Victim-4 online and attempted to persuade Victim-4 to take and send sexually explicit photographs of herself to SANTOS.

(Title 18, United States Code, Sections 2422(b), 2427, and 2.)

COUNT FIVE
(Attempted Receipt of Child Pornography)

5. From at least in or about June 2023, through in or about September 2023, in the Southern District of New York and elsewhere, EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, knowingly received and distributed material that contains child pornography using a means and facility of interstate and foreign commerce and that has been

mailed and has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so, to wit, SANTOS attempted to receive files containing sexually explicit images of Victim-4 from a computer in Westchester County via an online messaging program.

(Title 18, United States Code, Sections 2252A(a)(2)(B) and (b)(1), and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

6. I am a Special Agent with the FBI and a member of the FBI's New York-based JTTF, and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with law enforcement agents and other people, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

7. As set forth in greater detail below, the FBI has been investigating a series of online bomb threats to more than 150 school districts, synagogues, airports, hospitals, and a shopping mall. These threats, which began on or about September 15, 2023, have spanned multiple states, including New York, Pennsylvania, Connecticut, Arizona, and Alaska, and have resulted in a massive disruption to the lives of thousands of residents of the targeted locations, including schoolchildren. Through this investigation, the FBI has identified the sender of these bomb threats as EDDIE MANUEL NUNEZ SANTOS, a/k/a "Lucas," the defendant, a 32-year-old Peruvian national residing in the vicinity of Lima, Peru. SANTOS has also solicited nude and sexually explicit photographs from multiple minor girls online, and appears to have sent at least certain of the bomb threats—some of which have targeted institutions in areas where those minors reside and which have directed the targeted institutions to call telephone numbers associated with the minors—in retaliation for the rejection of SANTOS's requests to produce and send such child pornography.

The Bomb Threats Sent by the Defendant

8. Based on my participation in this investigation, including my review of law enforcement reports and records, and my conversations with other law enforcement agents and others, I have learned, in substance and in part, the following:

a. On or about September 15, 2023, the FBI began receiving reports of bomb threats, sent primarily via email or online contact forms, to various institutions located across New York, Pennsylvania, Connecticut, Arizona, and Alaska. The threats have all contained substantially similar content, and they have targeted schools, synagogues, airports, hospitals, and a shopping mall.

b. For example, on or about September 17, 2023, a synagogue in Westchester County received the following email:

I placed multiple bombs inside the Jewish Center. The bombs I placed in the building will blow up in a few hours. Many people will lay in a pool of blood.

c. That same day, another synagogue in Westchester County received the following email:

I placed bombs in the Jewish Center. The pipe bombs will blow up in a few hours. A lot of innocent people will die.

d. Since the threats began, numerous schools, airports, and other institutions across New York State have received the bomb threats, including a synagogue in Manhattan and a synagogue in the Bronx. Substantially similar threats have also been sent during this same time period to schools, synagogues, airports, hospitals, and a shopping mall in other states, including Pennsylvania, Connecticut, Arizona, and Alaska.

e. For example, on or about September 19, 2023, the following email was sent to multiple school districts in Pennsylvania:

There are multiple bombs placed inside of all the schools from your school district. The bombs will blow up in a few hours. I will make sure everybody dies and rots from the bombs and then I'll gladly smile seeing their families suffer.

f. The next day, on or about September 20, 2023, emails containing the following threat were sent to approximately 24 additional school districts in Pennsylvania:

I placed multiple bombs in all of the schools from your School Districts. The bombs will blow up in a few hours. I'll gladly smile when your families are crying because of your deaths.

g. In total, since on or about September 15, 2023, the FBI has received reports of well over 150 such threats to these institutions (the “Bomb Threats”), the substantial majority of which are schools, all containing substantially similar language, as described above.

h. The Bomb Threats have triggered emergency law enforcement responses and have resulted in significant disruptions to the targeted institutions and areas, including, among other things, school evacuations and closures, airline flight delays, and a lockdown of a hospital.

i. For example, as a result of just one of the Bomb Threats, sent on or about September 19, 2023, more than 1,100 schoolchildren across approximately 20 different schools were evacuated in Pennsylvania.

Identification of SANTOS as the Perpetrator of the Bomb Threats

9. Based on my participation in this investigation, including my review of law enforcement reports and records, my conversations with other law enforcement agents and others, and my review of records from electronic communications providers and others, as well as my training and experience, I have learned, in substance and in part, the following:

a. A large number of the Bomb Threats were sent via email, from email addresses with one of two different domain names (“Target Domain Name-1” and “Target Domain Name-2”).

b. Based on my review of metadata associated with the emails containing the Bomb Threats, I have learned that Target Domain Name-1 was created using a particular email delivery service (“Email Provider-1”), which allows its users to create custom domain names for new email addresses.

c. Based on my review of information provided by Email Provider-1, I have learned that the Email Provider-1 account used to create Target Domain Name-1 is subscribed to “Eddie Nunez,” and is associated with a Peruvian telephone number (“Target Phone Number-1”), a particular email address (the “Target Email Address”), and a particular Internet Protocol (“IP”) address (the “Target IP Address”).

d. Based on my review of travel and other records maintained by U.S. law enforcement authorities, I have learned that Target Phone Number-1 is associated with EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, a 32-year-old Peruvian national residing in the vicinity of Lima, Peru.

e. Based on my review of a publicly available online profile for SANTOS, I have learned that SANTOS is a website developer working for a particular company (“Company-1”), and that the Target Email Address consists of a shortened version of the name of Company-1. Based on open-source information and information received from an online payment service (“Payment Service-1”), I have further learned that Company-1 is associated with a second telephone number (“Target Phone Number-2”), which is in turn associated with a Payment Service-1 account subscribed to SANTOS.

f. Based on my review of publicly available databases, I have learned that the Target IP Address traces to a location in the vicinity of Lima, Peru.

g. Based on my review of publicly available databases, I have further learned that Target Domain Name-2 is associated with an online security provider (“Online Security Provider-1”), which protects websites from malicious attacks from external parties.

h. Based on my review of information provided by Online Security Provider-1, I have learned that the Online Security Provider-1 account associated with Target Domain Name-2 is subscribed to “Juan Santos”; that Target Domain Name-2 was registered using an IP address that traces to a location in the vicinity of Lima, Peru; and that payments on the Online Security Provider-1 account were made using the Target Email Address.

10. Based on the foregoing, and my training, experience, and participation in this investigation, I believe that EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, is responsible for sending the Bomb Threats.

**The Defendant’s Efforts to Produce and Receive Child Pornography and
His Threats Against Minors**

11. Based on my participation in this investigation, including my review of law enforcement reports and records, my conversations with other law enforcement agents, witnesses and victims, and my review of records provided by electronic communications providers and others, as well as my training and experience, I have learned, in substance and in part, the following:

Victim-1, Victim-2, and Victim-3

a. Multiple of the Bomb Threats have included a reference to a particular telephone number (the “Victim-1 Phone Number”), and a directive for the targeted institutions receiving the threats to contact that number.

b. Based on my conversations with other law enforcement agents who interviewed a 17-year-old female residing in Pennsylvania (“Victim-1”), I have learned that Victim-1 reported the following, in substance and in part:

i. The Victim-1 Phone Number is used by Victim-1.

ii. Since at least in or about August 2023, Victim-1 has been communicating with two female friends (“Victim-2” and “Victim-3”) via an online game platform (“Game-1”). One of those friends, Victim-3, is 13 years old.

iii. During the course of those communications, Victim-2 warned Victim-1 that an individual believed by law enforcement to be EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, who identified himself in the communications as “Lucas” and falsely represented himself to be a teenage male, had messaged Victim-2 and asked that Victim-2 send nude photographs of herself to “Lucas.”

iv. “Lucas” subsequently attempted to communicate directly with Victim-1. Based on the warnings from Victim-2 referenced above, Victim-1 blocked communications from “Lucas.”

c. Based on my conversations with other law enforcement agents who interviewed Victim-3, who resides in Pennsylvania, I have learned that Victim-3 reported the following, in substance and in part:

i. After Victim-1 blocked communications from “Lucas,” “Lucas” informed Victim-3 that he would bomb Victim-1’s school. Based on my review of an online conversation that took place on Game-1 between Victim-3 and “Lucas” on or about September 15, 2023, I have learned that during the conversation, “Lucas” stated, in substance and in part, that he had emailed bomb threats to school districts in Pennsylvania and included Victim-1’s telephone number in those threats. As described above, SANTOS sent numerous Bomb Threats beginning on or about September 15, 2023 to schools in Pennsylvania directing the targeted schools to contact the Victim-1 Phone Number.

ii. During the course of their communications, “Lucas,” after being informed of Victim-3’s age, asked that Victim-3 send nude photographs of herself to “Lucas.”

d. Beginning at least on or about September 21, 2023, certain of the Bomb Threats have included a reference to another telephone number (the “Victim-3 Phone Number”), and a directive for the targets of the threats to contact that number. Based on my conversations with other law enforcement agents who interviewed Victim-3, I have learned that the Victim-3 Phone Number is used by Victim-3.

e. Based on my review of publicly available databases, I have learned that “Lucas” used a virtual private network (“VPN”) provider (“VPN Provider-1”) when communicating with Victim-3 on Game-1 on or about September 15, 2023, as described above.¹ I have further learned that VPN Provider-1 was also used in connection with the transmissions of multiple of the Bomb Threats.

Victim-4

f. Beginning at least on or about September 20, 2023, certain of the Bomb Threats have included references to a particular IP address (the “Victim-4 IP Address”), and a directive for the targets of the threats to contact that IP address.

g. Based on my participation in an interview of a 16-year-old female residing in New York (“Victim-4”), as well as my conversations with other law enforcement agents who separately interviewed Victim-4, I have learned that Victim-4 reported the following, in substance and in part:

i. In or about June 2023, when Victim-4 was 15 years old, Victim-4 began communicating online with an individual believed by law enforcement to be SANTOS, who identified himself as “Lucas” and falsely represented himself to be a teenage male.

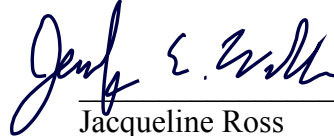
¹ Based on my training and experience, I know that VPNs can be used by individuals to help keep their online activity hidden. Specifically, when an electronic device connects to a VPN, the electronic device receives a new IP address from the VPN provider, and the IP address assigned to the electronic device by the Internet service provider is hidden.

ii. During the course of those communications, after Victim-4 informed “Lucas” of her age, “Lucas” repeatedly asked that Victim-4 send nude photographs of herself to “Lucas.” For example, and as I have confirmed based on my review of screenshots of Victim-4’s communications with “Lucas,” on or about August 23, 2023, “Lucas” asked Victim-4 to send “Lucas” a photograph of her “pussy,” stating, “i wanna jerk off to it,” and “i would cum so much to it.”

iii. After Victim-4 refused to send “Lucas” nude photographs of herself, “Lucas” threatened Victim-4 by stating that he would plant bombs in Victim-4’s school district, which “Lucas” stated he believed to be in Westchester County, and by killing Victim-4.

12. Based on the foregoing, and my training, experience, and participation in this investigation, I believe that “Lucas” is an alias used by EDDIE MANUEL NUNEZ SANTOS, the defendant, that is, the person responsible for sending the Bomb Threats.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of EDDIE MANUEL NUNEZ SANTOS, a/k/a “Lucas,” the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



Jacqueline Ross
Special Agent
Federal Bureau of Investigation

*Signed by Judge with
permission of Agent*

Sworn to me through the transmission of
this Complaint by reliable electronic means (telephone),
this 21st day of September, 2023.



THE HONORABLE JENNIFER E. WILLIS
United States Magistrate Judge
Southern District of New York